

**AUSTIN ENERGY'S
2022 BASE RATE REVIEW**

§ **BEFORE THE CITY OF AUSTIN**
§
§ **IMPARTIAL HEARING EXAMINER**

**AUSTIN ENERGY'S RESPONSE TO PAUL ROBBINS'
SECOND REQUEST FOR INFORMATION**

Austin Energy files this Response to Paul Robbins' ("P. Robbins") Second Request for Information ("RFI") submitted on May 31, 2022. Pursuant to the 2022 Austin Energy Base Rate Review Procedural Guidelines § F(2)(f)(1), this Response is timely filed.

Respectfully submitted,

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**ATTORNEYS FOR THE CITY OF AUSTIN
D/B/A AUSTIN ENERGY**

P. Robbins 2-1: Austin Energy has made the statement that it must collect a larger percentage of its Residential revenue from monthly fees because average Residential consumption is falling due to energy efficiency.

In 2020, AE provided me with statistics to prove this, included here as **Attachment A**.

I am asking to receive a copy of such statistics *or their most recent update* as part of official discovery. Spreadsheet format is requested.

Also, provide the following clarifications on the statistics' context.

- A. It would appear that the statistics that I received in 2020 included monthly consumption during construction of the project. Is this the case?
- B. If it is the case that the statistics included consumption during construction, provide revised statistics that delete consumption during construction.
- C. Provide the raw data used in the summary statistics provided to the extent that privacy redactions allow.
- D. Clarify if the statistics that AE is providing designate which Residential units are provided cooling and/or heating from a centralized HVAC system (such as occur in downtown condo high rise buildings). If the answer is yes, designate which bills are relevant to this condition in the raw data that is requested.

Note: When I requested this information in 2020, it took almost two months for Austin Energy to provide it. Given the rate case schedule, I am expecting a more timely response this time.

ANSWER:

- A. Home building loops for construction are not included in residential statistics.
- B. N/A.
- C. See Attachment P. Robbins 2-1.
- D. While residential statistics do include customers served by Austin Energy's District Cooling, that level of detail is not available to report the number of bills for the customers served by District Cooling.

Attachment P. Robbins 2-1
(provided in Native Excel Format)

Prepared by: JL

Sponsored by: Grant Rabon

P. Robbins 2-2: AE has held a series of meetings to brief the public on its rate proposals. I am requesting a list of attendees of these meeting, and to the extent available, their contact information. Spreadsheet format is requested.

Also, provide the transcripts of the questions and answers provided at each of these meetings, including the names of the participants associated with them

ANSWER: Austin Energy filed a Notice of Procedural Guidelines Section C(2) Ruling on June 10, 2022 because the City of Austin Law Department determined that some responsive information is considered either confidential competitive information, confidential critical infrastructure information, or confidential customer information which Austin Energy cannot legally disclose.

Notwithstanding the above-referenced objection, please see the attachments labeled as Attachment P. Robbins 2-2.

Prepared by: MM / YT

Sponsored by: Tammy Cooper

Attachment P. Robbins 2-2
(provided in Native Excel Format)

P. Robbins 2-3: For fiscal years 2020, 2021 and 2022, I am requesting to see copies of all AE communications, written and electronic, regarding participants in the Customer Assistance Program asking to be removed from the program, or complaining about the program.

I am also requesting a tally of these requests for removals and reasons for complaints for each of these years. Spreadsheet format is requested.

ANSWER: Austin Energy filed an objection on June 10, 2022 to P. Robbins 2-3.

Notwithstanding the above-referenced objection, the information being requested is not available. The CAP Discount Program has configured an Opt-Out process which is managed by Austin Energy's third-party vendor. Customers who inquire about being removed from the CAP discount program are handled through a variety of channels. Customers can call in to the contact center and a work request is created for the CAP team to resolve. The customer may send an e-mail which is routed through our phone system to be worked by a team of experts in this area. A third-party vendor processes the requests to ensure all systems of records for the discount program are updated. Austin Energy does not track reason or cause for the request. Austin Energy does not currently have a report detailing the number of Opt-Out requests received.

Prepared by: RM

Sponsored by: Jerry Galvan

P. Robbins 2-4: Provide Customer Assistance Program (CAP) participation counts and consumption by zip code, zip code +3, census tract, and census block for fiscal years 2019, 2020, and 2021. Spreadsheet format is requested.

ANSWER: Please see Attachment P. Robbins 2-4.

Prepared by: JT

Sponsored by: Mark Dombroski

Attachment P. Robbins 2-4
(provided in Native Excel Format)

P. Robbins 2-5: Provide aggregate monthly Customer Assistance Program consumption by consumption tier for FY 2020, 2021, and the test year.

ANSWER: Please see Attachment P. Robbins 2-5.

Prepared by: AAM / JL

Sponsored by: Grant Rabon

	10/31/20	11/30/20	12/31/20	01/31/21	02/28/21	03/31/21	04/30/21	05/31/21	06/30/21	07/31/21	08/31/21	09/30/21	Totals
T0	0	0	0	0	0	0	0	0	0	0	0	0	0
T1	15,895,662	14,358,551	16,831,003	15,694,669	16,506,731	13,213,230	17,071,523	18,523,375	19,987,808	17,152,781	18,443,233	15,227,593	198,906,159
T2	10,060,553	6,949,430	7,945,962	8,746,816	7,896,536	6,441,791	7,274,409	9,061,882	12,911,708	13,335,828	14,105,510	12,263,035	116,993,460
T3	3,659,574	1,744,413	2,499,721	4,001,474	3,307,171	2,550,539	1,738,097	2,365,737	5,270,292	7,305,920	7,495,372	7,309,602	49,247,912
T4	1,186,795	418,327	863,788	2,319,887	1,657,176	1,235,275	417,078	606,708	2,077,562	3,968,981	3,894,785	4,502,437	23,148,799
T5	160,409	30,287	101,846	473,388	276,779	206,627	45,769	107,200	208,105	582,020	465,604	686,584	3,344,618
Totals	30,962,993	23,501,008	28,242,320	31,236,234	29,644,393	23,647,462	26,546,876	30,664,902	40,455,475	42,345,530	44,404,504	39,989,251	391,640,948

Included in: WP H-5.1, rows 33-37, columns 'C' and 'D'

P. Robbins 2-6: Provide what percent each fuel (gas, nuclear, coal, wind, solar, wood, ERCOT market) made up of the Power Supply Adjustment (PSA) in FYs 2020 and 2021, as well as the total cost of fuel in those years.

ANSWER: Austin Energy filed an objection on June 10, 2022 to P. Robbins 2-6.

Prepared by: TD

Sponsored by: Thomas Brocato

P. Robbins 2-7: Provide what percent of each fuel is predicted to make up the PSA in 2022, 2023, and the test year, as well as the total expected cost of fuel in those years.

ANSWER: Austin Energy filed an objection on June 10, 2022 to P. Robbins 2-7.

Prepared by: TD

Sponsored by: Thomas Brocato

P. Robbins 2-8: Explain what Austin Energy is doing or plans to do to lobby the federal government to limit foreign gas exports from the U.S. that might increase the cost of domestic supply.

ANSWER: Austin Energy filed an objection on June 10, 2022 to P. Robbins 2-8.

Prepared by: TD

Sponsored by: Thomas Brocato

P. Robbins 2-9: Detail the annual work and costs of capital improvements and major repairs for each of the following power plants: the South Texas Nuclear Project; the Fayette Power Plant; the Nacogdoches Biomass Plant; and Sandhill Energy Center since the last rate case. This includes FY 2022. Spreadsheet format is requested.

ANSWER: Please see Attachment P. Robbins 2-9.

Prepared by: NK

Sponsored by: Monica Gonzalez

Attachment P. Robbins 2-9
(provided in Native Excel Format)

P. Robbins 2-10: Detail the expected annual work and costs of capital improvements and major repairs for each of the following power plants after FY 2022 for the next 5 years: the South Texas Nuclear Project; the Fayette Power Plant; the Nacogdoches Biomass Plant; and Sandhill Energy Center. Spreadsheet format is requested.

ANSWER: Austin Energy filed an objection on June 10, 2022 to P. Robbins 2-10.

Prepared by: TD

Sponsored by: Thomas Brocato

P. Robbins 2-11: Provide the annual principal and interest payments for each of the following power plants beginning in FY 2022 until the debt is retired: the South Texas Nuclear Project; the Fayette Power Plant; the Nacogdoches Biomass Plant; and Sandhill Energy Center. Spreadsheet format is requested.

ANSWER: Please see Attachment P. Robbins 2-11.

Prepared by: MG

Sponsored by: Monica Gonzalez

STP Accrual Basis Debt Service

FY	Principal	Interest
2022	2,683,704.48	1,842,983.87
2023	2,853,220.65	1,788,650.99
2024	3,247,709.71	1,700,757.37
2025	4,036,004.68	1,594,361.96
2026	7,037,441.59	1,460,501.19
2027	8,173,554.29	1,224,201.62
2028	3,356,489.61	955,093.34
2029	1,331,272.08	860,218.02
2030	1,227,334.91	812,359.08
2031	939,918.82	765,958.12
2032	1,005,352.87	736,865.36
2033	1,084,461.54	700,735.45
2034	1,136,022.39	658,674.42
2035	1,235,564.80	614,106.55
2036	3,309,315.48	566,790.02
2037	3,085,444.05	489,559.37
2038	1,476,716.12	419,124.49
2039	1,079,332.20	366,016.26
2040	1,132,616.37	312,981.28
2041	583,403.58	257,326.55
2042	410,769.92	233,011.01
2043	432,068.61	212,347.99
2044	454,219.26	190,608.58
2045	477,483.99	167,758.36
2046	501,862.80	143,736.70
2047	527,486.77	118,489.56
2048	554,618.03	91,953.02
2049	583,125.52	64,050.09
2050	612,943.69	34,713.60
2051	155,120.04	3,878.00
Total	54,724,578.87	19,387,812.24

P. Robbins 2-12: Detail the annual costs provided to local governments to compensate for government services for the Nacogdoches Biomass Plant (possibly labeled payment in lieu of taxes) since Austin Energy assumed ownership, as well as estimates for the test year. Spreadsheet format is requested.

ANSWER: Austin Energy filed an objection on June 10, 2022 to P. Robbins 2-12.

Prepared by: TD

Sponsored by: Thomas Brocato

P. Robbins 2-13: Provide the base revenue costs by month by class for FYs 2020, 2021 and the test year. Spreadsheet format is requested.

ANSWER: There are no responsive documents. Austin Energy does not analyze its base-rate costs by class on a monthly basis. For an annual analysis of base-rate costs for fiscal year 2021, which is also the test year in this proceeding, please see the Base Rate Filing Package at Appendix C. No such analysis exists for fiscal year 2020.

Prepared by: BTM

Sponsored by: Brian Murphy

P. Robbins 2-14: Provide the amount of money paid to CAP participants in FYs 2020, 2021, and the test year for: the monthly fee waiver; each consumption tier; and the CAP surcharge waiver. An example of this (without the surcharge waiver) is provided as **Attachment B**. Spreadsheet format is requested.

ANSWER: Please see Attachment P. Robbins 2-14 for historic (FY 2020 & FY 2021) CAP discount data. For the totals developed for the test year, see Schedule H-5.2.1 in the Cost-of-Service model.

Prepared by: MG

Sponsored by: Monica Gonzalez & Grant Rabon

	FY20	FY21
CAP Discount	\$ 4,459,504	\$ 5,126,240
CAP Charge Credit	530,505	538,211
Customer Charge Credit	3,816,970	4,101,610
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Total	\$ 8,806,979	\$ 9,766,061

P. Robbins 2-15: Provide a list of property owned by Austin Energy that has been sold or leased since the last rate case, the date of the sale or lease, and the amount of money that the utility has received for each property since sale or lease. Spreadsheet format is requested.

ANSWER: Austin Energy did not have any new property sold or leased (from January 2017 through September 2021).

Prepared by: MG

Sponsored by: Monica Gonzalez